

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Guadalupe Arenas Vargas, et al.
Plaintiffs

V.

Traylor Brothers, Inc., et al.
Defendants

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Civil Action No. H-09-2521

**PLAINTIFF GUADALUPE ARENAS VARGAS, INDIVIDUALLY'S,
OBJECTIONS AND ANSWERS TO DEFENDANT, JL STEEL REINFORCING,
L.L.C.'S FIRST SET OF INTERROGATORIES**

TO: Defendant JL STEEL REINFORCING, L.L.C. by and through its attorneys of record, Mr. Wade R. Quinn, Barker Lyman, 3600 One Houston Center, 1221 McKinney Street, Houston, TX 77010-2009.

Pursuant to the Federal Rules of Civil Procedure, Plaintiff Guadalupe Arenas Vargas, Individually, serves the following Objections and Answers to Defendant's Interrogatories.

Respectfully submitted,

By: /s/ Christopher K. Johns

ANTHONY G. BUZBEE
SBOT No: 24001820
SD ID No. 22679
JP Morgan Chase Tower
600 Travis Street, Suite 7300
Houston, Texas 77002
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OF COUNSEL:

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Christopher K. Johns
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EXHIBIT L

and

THE LAW OFFICE OF GARCIA & KARAM, L.L.P.

Ricardo Garcia
SBOT No. 07643200
Aizar Karam
SBOT No. 00796860
820 South Main
McAllen, Texas 78501
Telephone: 956-630-2882
Facsimile: 956-6305393

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document has been duly served on all known counsel of record and pro se parties in accordance with the Federal Rules of Civil Procedure on this *22nd day of January, 2010*, as set forth below:

Peter J. Bambace
Holm, Bambace & McCabe, LLP
1010 Lamar, Ste. 1100
Houston, Texas 77002

David S. Bland
LeBlanc Bland PLLC
1717 St. James Place, Ste. 360
Houston, Texas 77056

Juan Hernandez
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8111 LBJ Freeway, Suite #1065
Dallas, Texas 75251

William R. (Butch) Korb, Jr.
Bourland, Wall & Wenzel, P.C.
301 Commerce Street, Ste. 1500
Fort Worth, Texas 76102-4115

Steve M. Sikich
The Sikich Law Firm
Post Office Box 1432
Lake Charles, Louisiana 70602

/s/ Christopher K. Johns
Christopher K. Johns

**PLAINTIFF GUADALUPE ARENAS VARGAS, INDIVIDUALLY'S,
OBJECTIONS AND ANSWERS TO DEFENDANT, JL STEEL
REINFORCING, L.L.C.'S FIRST SET OF INTERROGATORIES**

1. State your full name, date of birth, age, and current address.

ANSWER:

Name: Guadalupe Arenas Vargas

Date of Birth: February 26, 1985

**Address: C Olivia Loses de Felan 344 Fracc. Arboledas 25500
San Buenaventura, Coahuila**

2. Please state specifically the nature of any damage and/or injuries suffered by you which you allege to have been caused by this Defendant.

ANSWER:

Plaintiff objects to this interrogatory to the extent it is overly broad, unduly burdensome, and seeks to require a narrative answer in such detail as is only possible in an oral deposition or testimony at trial.

Subject to and without waiving the foregoing objections, see the following:

As a result of Defendant's conduct, Plaintiff has suffered loss of support, mental anguish, loss of companionship and society, and loss of inheritance. Plaintiff's economic losses will be set forth in a report prepared by her retained expert economist.

Plaintiff seeks exemplary damages from Defendant based on Defendant's gross negligence.

3. Have you recovered from the damages and/or injuries you allege to have been caused by this Defendant in this lawsuit? If not, what complaints do you still have?

ANSWER:

Plaintiff objects to this interrogatory to the extent it is overly broad, unduly burdensome, and seeks to require a narrative answer in such detail as is only possible in an oral deposition or testimony at trial.

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Civil Action No. H-09-2521

**GUADALUPE ARENAS VARGAS, AS REPRESENTATIVE
OF THE ESTATE OF MARTIN ANASTACIO REYES OSUNA'S,
OBJECTIONS AND ANSWERS TO DEFENDANT, JL STEEL REINFORCING,
L.L.C.'S FIRST SET OF INTERROGATORIES**

TO: Defendant, JL STEEL REINFORCING, L.L.C., by and through its attorneys of record, Mr. Wade R. Quinn, Barker Lyman, 3600 One Houston Center, 1221 McKinney Street, Houston, TX 77010-2009.

Pursuant to the Federal Rules of Civil Procedure, Plaintiff Guadalupe Arenas Vargas, As Representative Of The Estate Of Martin Anastacio Reyes Osuna, serves the following Objections and Answers to Defendant's First Set of Interrogatories.

Respectfully submitted,

By: /s/ Christopher K. Johns

ANTHONY G. BUZBEE

SBOT No: 24001820

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Lake Charles, Louisiana 70602

/s/ Christopher K. Johns
Christopher K. Johns

**GUADALUPE ARENAS VARGAS, AS REPRESENTATIVE
OF THE ESTATE FOR MARTIN ANASTACIO REYES OSUNA'S,
OBJECTIONS AND ANSWERS TO DEFENDANT, JL STEEL REINFORCING,
L.L.C.'S FIRST SET OF INTERROGATORIES**

1. State your full name, date of birth, age, and current address.

ANSWER:

**Name: Guadalupe Arenas Vargas
Date of Birth: February 26, 1985
Address: C Olivia Loses de Felan 344 Fracc. Arboledas 25500
San Buenaventura, Coahuila**

2. With respect to the deceased, at the time of death, please state his full name, address, date and place of birth, occupation and business address, social security number, all prior names by which deceased had been known and all prior residence addresses for the last ten years.

ANSWER:

**Name: Martin Anastacio Reyes Osuna
Address: 9435 Middle Fiskville, Austin, Texas 78753
Place of Birth: Monclova, Coahuila, Mexico
Date of Birth: April 2, 1983
Occupation: Construction Worker for JL Steel**

3. Please state the highest level of education decedent attained as well as the degree, date of degree and any special scholastic honors achieved by the decedent.

ANSWER:

Plaintiff cannot recall at this time. Plaintiff will supplement.

4. If the decedent was survived by a spouse, any natural or adopted children, or either parent, please state for each his/her name, date of birth and present address.

ANSWER:

Spouse: Guadaupe Arenas Vargas (Please see Answer to Interrogatory No.1 for additional information).

Children: Zaid Martin Arenas Vargas (DOB: 05/10/2002; Address: C Olivia Loses de Felan 344 Fracc. Arboledas 25500 San Buenaventura, Coahuila)

5. For each person surviving decedent and claiming damages in this action, please state his/her name, address and date of birth.

ANSWER:

Zaid Martin Arenas Vargas, Guadalupe Arenas Vargas (see above for contact information)

Martin Reyes Adame (Address: Privada Francisco Villa 366, San Buenaventura, Coahuila, Mexico 25500)

Juana Silva Osuna Garcia (Address: Privada Francisco Villa 366, San Buenaventura, Coahuila, Mexico 25500)

6. If the decedent died testate, please state the date the will and each codicil was executed; whether the will is still in probate; the name, address and relationship to decedent of each beneficiary named in the will along with the bequest or devise made to each; and the name and address of each attorney of record in the probate of the will.

ANSWER:

Plaintiff is not aware of any will. Plaintiff will supplement if need be.

7. Please indicate which, if any, of the following decedent ever suffered from, along with dates –

Heart trouble

Paralysis

Diabetes

Cancer

Epilepsy

Neck or back pain

Ulcers

Alcoholism

Venereal disease

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Civil Action No. H-09-2521

**PLAINTIFF, GUADALUPE ARENAS VARGAS, AS NEXT FRIEND OF ZAID
MARTIN REYES ARENAS'S, OBJECTIONS AND ANSWERS TO DEFENDANT
JL STEEL REINFORCING, L.L.C.'S FIRST SET OF INTERROGATORIES**

TO: Defendant, JL STEEL REINFORCING, L.L.C., by and through its attorneys of record, Mr. Wade R. Quinn, Barker Lyman, 3600 One Houston Center, 1221 McKinney Street, Houston, TX 77010-2009.

Pursuant to the Federal Rules of Civil Procedure, Plaintiff, Guadalupe Arenas Vargas, As Next Friend of Zaid Martin Reyes, serves the following Objections and Answers to Defendant's First Set of Interrogatories.

Respectfully submitted,

By: /s/ Christopher K. Johns
ANTHONY G. BUZBEE
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OF COUNSEL:

THE BUZBEE LAW FIRM
Christopher K. Johns
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and

THE LAW OFFICE OF GARCIA & KARAM, L.L.P.

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Post Office Box 1432
Lake Charles, Louisiana 70602

/s/ Christopher K. Johns
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PLAINTIFF, GUADALUPE ARENAS VARGAS, AS NEXT FRIEND OF ZAID MARTIN REYES ARENAS'S, OBJECTIONS AND ANSWERS TO DEFENDANT JL STEEL REINFORCING, L.L.C.'S FIRST SET OF INTERROGATORIES

1. State the Minor Child's name, address, date of birth, social security number, driver's license number, and marital status.

ANSWER:

Zaid Martin Reyes Arenas

Address: C Olivia Loses de Felan 344 Fracc. Arboledas 25500

San Buenaventura, Coahuila

Date of Birth: May 10, 2002

Minor Child does not have a U.S. Social Security Number

Minor Child does not have a driver's license

Minor Child is not married.

2. Please state:
 - a. When the Minor Plaintiff first learned of the accident in question;
 - b. The name, address and telephone number of the person who informed the Minor Plaintiff of the accident;
 - c. How long after the accident the Minor Plaintiff first learned of same;
 - d. Where the Minor Plaintiff was located when he learned of same;
 - e. Whether the Minor Plaintiff ever went to the scene of the accident; and
 - f. The name, address and telephone number of each person who was present when the Minor Plaintiff learned of the accident.

ANSWER:

Plaintiff objects to this interrogatory to the extent it is overly broad, unduly burdensome, and seeks to require a narrative answer in such detail as is only possible in an oral deposition or testimony at trial, and is not reasonably calculated to lead to the discovery of relevant or admissible evidence.

Subject to and without waiving the foregoing objections, see the following:

- a. **Minor Plaintiff learned of the accident shortly after the incident.**
- b. **Minor Plaintiff learned of accident from his mother, Guadalupe Arenas Vargas.**